

SCANNED

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

CIVIL ACTION NO.: 07-CV-6084

RITA RAGONE,

Plaintiff,

v.

ATLANTIC VIDEO, INC. improperly  
identified as "Atlantic Video at the  
Manhattan Center, d/b/a MCP-AV, Inc."),  
ESPN, INC., WOODY PAIGE,  
JAY CRAWFORD, TED NELSON and  
LORI BERLIN,

Defendants.

MOTION TO ADMIT COUNSEL  
PRO HAC VICE

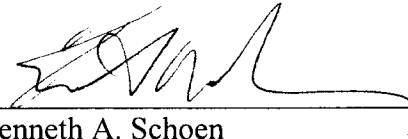
PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Court for the

Southern District of New York, I, KENNETH A. SCHOEN, a member in good standing of the Bar of this Court, hereby moves for an Order allowing the admission pro hac vice of ALAN S. BLOCK, partner at the law firm of BONNER KIERNAN TREBACH & CROCIATA, LLP, 1233 20<sup>th</sup> Street, NW, Eighth Floor, Washington, DC 20036, telephone (202) 712-7000, facsimile (202) 712-7100.

ALAN S. BLOCK is a member in good standing of the Bar of the District of Columbia. There are no pending disciplinary proceedings against ALAN S. BLOCK in the District of Columbia or Federal Court.

Dated: New York, New York  
May 9, 2008

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'K. Schoen', is written over a horizontal line.

Kenneth A. Schoen  
SDNY Bar: (KAS 7180)  
BONNER KIERNAN TREBACH  
& CROCIATA, LLP  
Empire State Building – Suite 3304  
New York, New York 10118  
Telephone: (212) 268-7535  
Facsimile: (212) 268-4965

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AFFIDAVIT OF KENNETH A. SCHOEN IN  
SUPPORT OF MOTION TO ADMIT COUNSEL PRO HAC VICE

State of New York     )  
                                  ) ss:  
County of New York    )

KENNETH A. SCHOEN, being duly sworn, hereby deposes and says as follows:

1. I am a Partner in the Law Firm of Bonner Kiernan Trebach & Crociata, LLP. I make this statement based on my personal knowledge of the facts set forth herein and in support of the motion to admit ALAN S. BLOCK as counsel pro hac vice to represent ATLANTIC VIDEO, INC. in this matter.

2. I am a member in good standing of the Bar of the state of New York, and was admitted to practice law in February 1, 1989. I am also admitted to the Bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. I have known ALAN S. BLOCK since 2000.

4. Mr. Block is my Partner at the law firm of Bonner Kiernan Trebach & Crociata, LLP, and primarily works out of our Washington, DC office.

5. I have found Mr. Block to be a skilled attorney and a person of high integrity. He is experienced in Federal practice and is quite familiar with the Federal Rules of Procedure.

6. Accordingly, I am pleased to move the admission of ALAN S. BLOCK, pro hac vice.


7. I respectfully request and submit that the proposed order granting the admission of ALAN S. BLOCK, pro hac vice, to represent ATLANTIC VIDEO, INC. in the above captioned matter should be granted.

Dated: New York, New York  
May 9, 2008

Respectfully submitted,

BONNER KIERNAN TREBACH  
& CROCIATA, LLP

By:

  
Kenneth A. Schoen  
SDNY Bar: (KAS 7180)  
Empire State Building – Suite 3304  
New York, New York 10118  
Telephone: (212) 268-7535  
Facsimile: (212) 268-4965

UNITED STATES DISTRICT COURT

Eastern

DISTRICT OF

Virginia

**CERTIFICATE OF  
GOOD STANDING**

I, Fernando Galindo, *Clerk of this Court,*

*certify that* Alan Stuart Block, *Bar #* 32528,

*was duly admitted to practice in this Court on*

July 9, 1991, *and is in good standing*  
*DATE*

*as a member of the Bar of this Court.*

*Dated at* Alexandria, VA *on* May 6, 2008.  
*LOCATION DATE*

Fernando Galindo  
*CLERK OF COURT*

Katherine M. Stasko  
*DEPUTY CLERK*

**UNITED STATES DISTRICT COURT**

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ESPN, INC., WOODY PAIGE, )  
JAY CRAWFORD, TED NELSON and )  
LORI BERLIN, )**

### Defendants.

# ORDER FOR ADMISSION PRO HAC VICE ON WRITTEN MOTION

Upon the motion of Kenneth A. Schoen, local counsel for ATLANTIC VIDEO, INC.,  
and said sponsor attorney's affidavit in support;

**IT IS HEREBY ORDERED** that

ALAN S. BLOCK  
Bonner Kiernan Trebach & Crociata, LLP  
1233 20<sup>th</sup> Street, NW  
Eighth Floor  
Washington, DC 20036  
Telephone: (202) 712-7000  
Facsimile: (202) 712-7100

is admitted to practice pro hac vice as counsel for ATLANTIC VIDEO, INC. in the above captioned cause in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing

(ECF) system, counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov).

Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated: New York, New York

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United States District/Magistrate Judge

cc: David Zatauchni, Esq.  
Kathleen M. McKenna, Esq.  
Alan S. Block, Esq.

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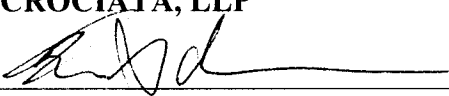
CERTIFICATION OF SERVICE

I, KENNETH A. SCHOEN, an attorney duly admitted to practice law in the Courts of the State of New York do hereby certify under penalty of perjury that on May 9, 2008 a copy of Defendant's **Motion to Admit Counsel Pro Hac Vice – Federal Rules of Civil Procedure 1.3(c)** was electronically filed and on May 9, 2008 was served by mailing same in a sealed envelope with postage prepaid, at an official depository of the United States Post Office addressed to the last known address of the addressee(s) listed below to:

David Zatauchni, Esq.  
**ZATUCHNI & ASSOCIATES, LLC**  
1 West Street  
Suite 100  
New York, New York 10004  
(212) 785-8980

Kathleen M. McKenna, Esq.  
**PROSKAUER & ROSE, LLP**  
1585 Broadway  
New York, New York 10036  
(212) 969-3130

**BONNER KIERNAN TREBACH  
& CROCIATA, LLP**

  
\_\_\_\_\_  
Kenneth A. Schoen  
SDNY Bar: (KAS - 7180)  
Empire State Building - Suite 3304  
New York, New York 10118  
(212) 268-7535  
Counsel for Defendant **ATLANTIC VIDEO, INC.**